

Data Submitted (UTC 11): 11/14/2021 8:00:00 AM

First name: Deanna

Last name: Wulff

Organization: Unite the Parks

Title:

Comments: We, concerned organizations and citizens of California, request that the Forest Service halt its plans to fast-track post-fire salvage logging and hazard tree logging across millions of acres of National Forest in Region 5. The Pacific Southwest region includes all of California's National Forests, totaling more than 20 million acres.

Under the proposed plan, it will be extremely difficult for the public and the agency to adequately analyze logging projects, and it is highly likely that damaging logging will occur across millions of acres, leaving a scarred and devastated landscape, prone to fires, and coming at a great environmental cost to people and wildlife, already suffering from climate change.

Post-fire salvage logging is one of the most damaging USFS activities performed on forest ecosystems, and this has been well established by peer-reviewed research dating back two decades. Post-fire logging disrupts ecological processes<sup>1</sup>, reduces wildlife habitat, compacts soils, damages riparian corridors, spreads invasive species, and causes erosion, which degrades water quality. It also inhibits forest regeneration and increases fire risk<sup>2</sup>.

1 Lindenmayer, D.B., and R.F. Noss. 2006. Salvage Logging, Ecosystem Processes, and Biodiversity Conservation. *Conservation Biology*, 20(4) 949–958.

2 Donato DC, Fontaine JB, Campbell JL, Robinson WD, Kauffman JB, Law BE. Post-wildfire logging hinders regeneration and increases fire risk. *Science*. 2006 Jan 20;311(5759):352. doi: 10.1126/science.1122855. Epub 2006 Jan 5. PMID: 16400111.

In the letter dated, October 25, 2021, the Forest Service detailed its plans to allow post-fire logging on an unprecedented scale across wide swaths of California's public lands [dash] with limited public input and limited environmental review. The Forest Service plans to do "Environmental Assessments," for each of three zones in nine National Forests:

\* [bull] The northern zone includes Klamath, Mendocino, Shasta-Trinity, and Six Rivers.

\* [bull] The central zone includes Lassen and Plumas.

\* [bull] The southern zone includes Inyo, Sequoia, and Sierra.

When an environmental assessment is performed, the foregone conclusion is that the logging project will have no significant environmental impact; yet the proposed maps (not fully detailed and available for public review) show millions of acres at risk. Page 2 of 2

In addition, under hazard tree rules, there is no limit on the size of trees logged, whether living or dead, and therefore, old growth trees and snags are vulnerable to logging under this proposal. The USFS also plans to log 300 feet out from existing roads, a non-standard distance, which will cover much of the landscape, and the USFS plans to log on non-motorized trails leading to pristine wilderness areas, which will damage previously intact ecosystems.

In a regular iteration of existing NEPA law, projects may have a full environmental impact statement, in which the USFS must assess and consider options and the effects of chosen actions, including choosing a "no action alternative." This enables the agency and groups and citizens to comment with an adequate understanding of the projects and their damage to the landscape. On the scale proposed here, entire forests are grouped under one

environmental assessment [ndash] totaling millions of acres [ndash] making an adequate analysis by the agency and a full response from the public a near impossibility.

Further, USFS is proposing to allow emergency orders, which would further truncate the review process, via an Emergency Situation Determination (ESD). If an ESD is sought and granted, it would expedite the actions proposed and waive the pre-decisional objection process. This would allow commercial sales of timber and logging on public land by the summer of 2022, while limiting public comment to a mere 30 days.

If such plans are enacted, they could devastate the state, prevent forest regeneration, damage wildlife, permanently scar the land, and set up the next big fire.

We request that the agency halt its plans, and instead dedicate its resources to habitat restoration, which implies preserving and protecting old growth trees and snags, closing roads that are unnecessary, (prioritizing access to non-motorized trails, picnic areas and campgrounds), remediating roads by restoring native species and planting trees, leaving wilderness areas and proposed wilderness areas and trails untouched (other than by performing trail maintenance), and taking a thoughtful approach to the protection of California's wildlife and native plants.

Preservation of our forests is essential to fighting climate change and vital to the future of the state, the nation, and the world. The current plans, if enacted, threaten the life and health of the forest and all the species that depend upon it